

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**CARRIE BAUER,
STEPHANEY MAYFIELD,
and ELIZABETH SUE**

Plaintiffs,

V.

**RUFE SNOW INVESTMENT, LLC.,
d/b/a IN-N-OUT GYROS and STOP-N-GO
GYROS, and
ZIAD MASSARWA, Individually**

Defendants

[illegible]

CA No. 3:21-cv-2250-BH

JURY DEMANDED

DEFENDANT RUFÉ SNOW INVESTMENT, LLC., d/b/a IN-N-OUT GYROS
and STOP-N-GO GYROS RESPONSES TO PLAINTIFF ELIZABETH SUE’S
FIRST SET OF INTERROGATORIES

TO: Elizabeth Sue by and through her attorney, David Langenfeld, LEICHTER
LAW FIRM1602 East 7th Street Austin, TX 78702

Respectfully submitted,

By: *Wes Dauphinot*

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Exhibit A

(817) 223-0989 telephone
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served on counsel for the Plaintiff(s), in the manner indicated, on August 18, 2022, as follows:

David Langenfeld
LEICHTER LAW FIRM
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Austin, Texas 78702

Via Email david@leichterlaw.com

Stephen Le Brocq
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Carrollton, Texas 75006

Via Email stephen@lebroccqhorner.com

/s/ Wes Dauphinot
WES DAUPHINOT

INTERROGATORY NO. 16

If the Plaintiff monitored or implemented legal compliance measures on behalf of the Defendant, please describe how and when (on a workweek-by-workweek basis) the Plaintiff did so.

ANSWER: None.

INTERROGATORY NO. 17

By week start date and end date for each workweek that the Plaintiff was employed, please state:

- a). The total number of hours worked each week by the Plaintiff in each such time period; and
- b). The total number of hours for which the Plaintiff was paid by the Defendant for each week that the Plaintiff worked.

ANSWER: Please see the paycheck details for Elizabeth Sue previously provided by Defendant in discovery.

INTERROGATORY NO. 18

Please state the exact amount of all compensation the Plaintiff was paid for each workweek the Plaintiff was employed by the Defendant, and, state how much of each such amount consisted of:

- a). salary;
- b). hourly wage;
- c). bonuses;
- d). commissions;
- e). tips; and
- f). any additional manner of compensation.

ANSWER: Elizabeth Sue received an hourly wage of \$13.00 per hour until May of 2021 when her pay increased to \$17.00 per hour. While she received \$13.00 per hour, she received additional compensation of cash tips and electronic tips from credit cards. While she received \$17.00 per hour, she received additional compensation of cash tips, but no

electronic tips.

INTERROGATORY NO. 19

Identify all evidence which in any way would indicate hours worked by Plaintiff including, but not limited to, emails, time sheets, time cards, credit card records, travel records, computer log-in records, computer log-out records, building entry records, building exit records, parking facility entry records, parking facility exit records and invoices or other documents to clients/customers or any third party payor evidencing billing for work performed by Plaintiff or in any way documenting work performed by Plaintiff.

ANSWER: Please see the paycheck details previously produced by Defendant in discovery.

INTERROGATORY NO. 20

For each shift worked by Plaintiff, state the amount of money paid by customers as tips and identify all other employees working during that shift and the employee who waited on the customer who paid the tip.

ANSWER: Please see the paycheck details previously produced by Defendant in discovery.

INTERROGATORY NO. 21

Identify all supervisors of Plaintiff during the relevant time period including their job titles and dates such person supervised Plaintiff.

ANSWER: Haneen Mahmood (210) 984-1992 was her supervisor for the first few months of Elizabeth's employment.

INTERROGATORY NO. 22

If you contend that your actions with respect to Plaintiff were taken in good faith with reasonable grounds to believe such conduct comported with the FLSA or interpretations of the FLSA pursuant to 29 U.S.C. § 260, then identify every fact upon which you rely in support of such contention.

ANSWER: Defendant treated Plaintiff in accordance with the law and paid her compensation for everything she was entitled to under the law.

INTERROGATORY NO. 23

If you contend your acts or omissions with regard to any claims brought by Plaintiff were

